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Attorneys for Solid Financial Technologies, Inc.

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

BYTECHIP, LLC d/b/a QBIT, a Delaware
 limited liability company,

Plaintiff,

v.

SOLID FINANCIAL TECHNOLOGIES,
 INC., a Delaware corporation; EVOLVE
 BANK & TRUST, an Arkansas corporation

Defendants.

CASE NO. 3:24-cv-1226

**JOINT STIPULATION AND [PROPOSED]
 ORDER FOR EXTENSION OF TIME FOR
 SOLID AND EVOLVE TO ANSWER OR
 OTHERWISE RESPOND TO COMPLAINT
 PURSUANT TO CIVIL LOCAL RULE 6-2**

[Removed from San Mateo Superior Court,
 Case No. 24-CIV-00307]

12009-00001/14761743.1

1 Plaintiff Bytechip, LLC (“Plaintiff” or “Bytechip”) and Defendants Solid Financial
2 Technologies, Inc. (“Solid”) and Evolve Bank & Trust (“Evolve”) (collectively “Defendants”), by
3 and through their respective attorneys of record herein and without waiving any rights, claims, or
4 defenses they have in this action, enter into this Stipulation pursuant to Civil Local Rule 6-2 and
5 request an order extending Defendants’ time to answer or otherwise respond to the Complaint, with
6 reference to the following circumstances:
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8 WHEREAS, Plaintiff filed its Complaint in San Mateo superior court on January 22, 2024;

9 WHEREAS, Defendants removed the action to the Northern District of California on
10 February 29, 2024;

11 WHEREAS, Defendants’ responses to the Complaint are currently due on March 7, 2024;

12 WHEREAS, the Parties have met and conferred and Plaintiff has agreed to extend
13 Defendants’ time to answer or otherwise respond to the Complaint until June 5, 2024;

14 WHEREAS, this extension will not alter or otherwise impact the date of any event or any
15 deadline already fixed by Court order, other than the Initial Case Management Conference which the
16 Parties respectfully request also be continued by 90 days;

17 THE PARTIES HEREBY STIPULATE, AGREE, AND REQUEST, that the Court extend
18 Defendants’ deadline to answer or otherwise respond to the Complaint until June 5, 2024.

19 The Parties submit the accompanying declaration of James Judah in support hereof and
20 respectfully request that the Court enter the attached proposed order.
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23 **IT IS SO STIPULATED.**
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26 12009-00001/14761743.1

27 Respectfully submitted,
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1 DATED: March 6, 2024

MICHAEL CHEN LAW

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4 By: /s/ Michael Chen
Michael Chen, Esq.
5 *Attorneys for Plaintiff*
6 **Plaintiff Bytechip, LLC**

7 DATED: March 6, 2024

TALG, LTD.

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10 By: /s/ Ismail Amin
Ismail Amin, Esq.
11 *Attorneys for Defendant*
12 **Evolve Bank & Trust**

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15 DATED: March 6, 2024

**QUINN EMANUEL EURQUHART &
SULLIVAN, LLP**

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18 By: /s/ James D. Judah
James D. Judah, Esq.
19 *Attorneys for Defendant*
20 **Solid Financial Technologies, Inc.**

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED,

DATED: _____, 2024 By: _____
Honorable Judge Laurel Beeler
United States Magistrate Judge

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ATTESTATION

I, James D. Judah, Esq., am the ECF User whose identification and password are being used to file the **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME FOR SOLID AND EVOLVE TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT PURSUANT TO CIVIL LOCAL RULE 6-2**. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Ismail Amin, Esq. and Michael Chen, Esq. has concurred in this filing.

DATED: March 6, 2024

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

By: /s/ James D. Judah
James D. Judah, Esq.
Attorneys for Defendant
Solid Financial Technologies, Inc.

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